

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

March 4, 2013

REPLY TO THE ATTENTION OF:

Mr. Tom Harmening City Manager City of St. Louis Park 5065 Minnetonka Boulevard St. Louis Park, MN 55416

Mr. John Jones Director of Regulatory Management Vertellus Specialties, Inc. 201 North Illinois Street, Suite 1800 Indianapolis, IN 46204

RE: Drift, Platteville, and St. Peter Aquifer Pumping Well Evaluations and Cessation Request Reilly Tar & Chemical Superfund Site, St. Louis Park, Minnesota

Dear Mr. Harmening and Mr. Jones:

The Minnesota Pollution Control Agency (MPCA) and the U. S. Environmental Protection Agency (EPA) received the Drift, Platteville, and St. Peter Aquifer Pumping Well Evaluations and Cessation Request on December 11, 2012, from Summit Envirosolutions on behalf of the City of St. Louis Park (City)¹. The Agencies cannot approve the cessation request at this time.

The extent of gradient control in the non-drinking water aquifers has not been adequately characterized, and there is a lack of plume definition. Additionally, there are significant differences between the City and the Agencies on interpreting contaminant concentration trends and migration, and the Agencies have questions concerning whether or not the monitoring network is sufficient.

This decision is consistent with the position we've outlined in correspondence over the past year. As these issues are resolved and the 30th anniversary of the Consent Decree (Civil No. 4-80-469) nears, we look forward to reconsidering the City's proposal.

¹ By agreement with the former Reilly Tar & Chemical Corporation (successor Vertellus Specialties Inc.), the City operates and maintains the remedy for the Reilly Tar Superfund site.

If you have questions on this matter, feel free to call Nile Fellows at (651) 757-2352 or Michelle Kerr at (312) 886-8961.

Sin¢erely,

Michelle Kerr

Remedial Project Manager

Superfund Division

U.S. Environmental Protection Agency

Nile Fellows, Project Leader

Superfund Unit 1

Superfund and Emergency Response Section

Remediation Division

Minnesota Pollution Control Agency

cc via e-mail: Mike Rardin, City of St. Louis Park

Scott Anderson, City of St. Louis Park

Dave Scheer, MPCA

William M. Gregg, Summit Thomas Mesevage, Vertellus